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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

JUN 07 2023 SMB

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

DEMANDED

JURY TRIAL

23-CV-3593
Judge Tharp
Magistrate Judge Weisman

ZAKKIYYA A GREENE

PLAINTIFF

VERSE

DEFENDANT

**UNIVERSITY OF CHICAGO HOSPITAL
UNIVERSITY OF CHICAGO HOSPITAL SAFETY AND SECURITY
POLICE DEPARTMENT
ERIC HEATH ASSOCIATE VICE PRESIDENT
KYLE BOWMAN CHIEF OF POLICE
UNIVERSITY OF CHICAGO HOSPITAL SAFETY AND SECURITY
OFFICER EARL EVANS (OFFICIAL AND INDIVISUAL CAPICITIES)
MONICA HALLOM HOSPITAL EMPLOYEE (OFFICIAL AND
INDIVISUAL CAPACITIES)
JOHN DOE HOSPITAL EMPLOYEE 1 (OFFICIAL AND INDIVISUAL
CAPACITIES)
OFFICER JOHN DOE 1 (OFFICIAL AND INDIVISUAL CAPACITIES)
OFFICER JOHN DOE 2 (OFFICIAL AND INDIVISUAL CAPACITIES)**

COMPLAINT

COMES NOW, PRO SE PLAINTIFF ZAKKIYYA GREENE in the above style and number to be determined by the court and bring forth this **Civil Complaint** and in support thereof will show into this Honorable Court that the Defendants violation of Plaintiff Zakkiyya Greene First, Second, Fourth, Constitutional Rights:

FACTS

I

That Plaintiff Zakkiyya Greene is a thirty-year-old black female that stands five foot / five inch tall and weigh one hundred two pounds.

II

That on or about December 13th, 2021, Plaintiff Zakkiyya Greene went to the University of Chicago Hospital (by way of the emergency room entrance) located at 5656 south Maryland Avenue Chicago, Illinois.

III

That upon entering the hospital Plaintiff Zakkiyya Greene approach University of Chicago employee Defendant Monica Hallom. Plaintiff was seeking information concerning her brother who had been transported to the University of Chicago Hospital via ambulance.

IV

That Plaintiff was told by Defendant Monica Hallom that Plaintiff's brother was not at the facility.

V

That Plaintiff Zakkiyya Greene knew that Defendant Monica Hallom was mistakenly or purposely passing on false information concerning the whereabouts of Plaintiffs injured brother.

VI

That Plaintiff Zakkiyya Greene knew that her brother (Alexander Greene) was at the University of Chicago Hospital therefore plaintiff proceeded to the nurse station.

VII

That before Plaintiff Greene reach the nurse station, Defendant University of Chicago Police Officer Earl Evans interjected. Defendant Hallom had shout across words to the effect “stop that woman”.

VIII

That Defendant Officer Evans approached Plaintiff Greene in a very aggressive manner.

IX

That Plaintiff Greene begin a verbal communication with the Defendant Officer Evans in which time Defendant Evan began to get more aggressive and irate toward Plaintiff.

X

That while the Plaintiff was engaged in conversation with Defendant Evans two more which seemed to be Defendant University Police Officers surrounded Plaintiff, these officers known as Defendant Monica Hallom and John Doe University of Chicago Hospital employee number one.

XI

That in response to Plaintiff Greene verbiage, Defendant Officer Evans struck Plaintiff Greene and said “shut up bitch” further, a struggle ensued involving Defendant Officer Evans, the John Doe Officer and Defendant Monica Hallom.

XII

That Plaintiff Greene was drag to the door and handcuffed during this time Plaintiff Greene was fuddled by Defendant Evans and the three John Doe Officers further, the three John Doe Defendants created a situation that any reasonable person should know or should have known that was improper in respect to Plaintiff rights and freedom as an American Citizen.

XIII

That Plaintiff Greene was in handcuffs at the time when fuddled by Defendant Evans and the three John Doe officers.

XIV

That Plaintiff Greene was never read Miranda Rights by Defendants University of Chicago Safety and Security Officers.

XV

That Plaintiff Greene was never told you are under arrest at no time before, during, or after being attacked, handcuffed and held in custody by Defendants University of Chicago Hospital Safety and Security officers.

XVI

That Plaintiff Greene was injured in the struggle between Defendants University of Chicago Hospital Security officers and staff, Plaintiff asked for medical treatment which was never given.

XVII

That Plaintiff Greene has video from the Defendant University of Chicago surveillance camera which reflect and /or document the complaint validity further, Plaintiff Greene has video and audio from another independent source.

XVIII

That on or about December 13th, 2021, Plaintiff Greene was arrested by Defendants University of Chicago Police and turned over to Chicago Police.

XIX

That Plaintiff Greene was charged with Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XX

That Plaintiff Greene was sent to the Cook County jail, where Plaintiff remained for about three days, until released on electric monitoring due to charge of Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXI

That Plaintiff Greene had hired a lawyer upon release for defense against the alleged charge Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXII

That on May 16th 2023 Plaintiff received NOLLE PROSEQUI on the charge Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXIII

That Plaintiff Greene responsibilities as a United States American citizen and sole parent of four children was disrupted due to unjust and or constitutional violations of Defendants University Chicago Hospital Safety and Security officers and staff.

XXIV

That Plaintiff Greene was denied employment from several employers due to pending Felony charge of Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans on background report.

XXV

That Plaintiff Greene also was prevented from employment during this time due to pending Felony charge Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans on background reports.

XXVI

That Plaintiff Greene F.O.I.D Card and Conceal Carrier License was suspended due to alleged Charge of Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXVII

That Plaintiff Greene alleged charge Aggravated Battery/Peace Officer, count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans occurred during covid-19 pandemic.

XXIII

That Plaintiff Greene is the sole provider and or guardian of four children.

XXIX

That Plaintiff Greene was demanded to be in person at all court hearings.

XXX

That Plaintiff Greene United States Constitutional rights was violated when walking into the Defendant University of Chicago hospital emergency room asking about Plaintiff brother (a patient at this time) then being violently attacked by the Defendant University of Chicago Safety and Security officer Earl Evans, Defendant University of Chicago Safety officer Monica Hallom, the Defendant University of Chicago hospital Employee John Doe one, and the Defendant University of Chicago hospital Safety and Security officer John Doe one and two.

XXXI

That Plaintiff Greene United States Constitutional rights was violated when arrested by Defendants University of Chicago Hospital officers on charge Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXXII

That Plaintiff Greene United States Constitutional rights was violated when given to the Chicago Police department on the charge Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021, against the Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXXIII

That Plaintiff Greene United States Constitutional rights was violated when denied medical treatment while in custody of Defendants University of Chicago Safety and Security officers.

XXXIV

That Plaintiff Greene United States Constitutional rights was violated when given the Cook County Jail on the charge of Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXXV

That Plaintiff Greene United States Constitutional rights was violated when given an electric monitoring ankle shackle to wear on the charge of Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXXVI

That Plaintiff Greene United States Constitutional rights was violated when documenting pending Felony on background reports for charge Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021 against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXXVII

That Plaintiff Greene United States Constitutional rights was violated when if under arrest being told and reading Miranda Rights for charge Aggravated Battery/Peace Officer, Count 1, Statue 720 ILCS 5/12-3.05(D)(4), and Degree F2 on arrest date December 13, 2021, against Defendant University of Chicago Hospital Safety and Security Officer Earl Evans.

XXXIII

That Defendant was personally involved in the sense of helping to cause A CIVIL RIGHT VIOLATION and acted intentionally, with sadistic intent.

XXXIX

That the Defendants acted and or performed manner under which unconstitutional practices occurred and allowed the continuance of such action and or way, by which position Defendant holds should have known to be unconstitutional.

XL

That Defendant conduct showed a reckless or callous indifference to the rights of Plaintiff.

XLI

That the Defendants were negligent by failure to use care as a reasonable prudent and careful person would use under similar circumstances including a broad range of acts and or failures to act that result in violating Plaintiff constitutional rights which led to hardship of another being and or United States Citizen.

XLIII

That the Defendants has shown culpable action Or inaction in training, for supervision or control of subordinates in which led to Plaintiff constitutional rights violation and or demeaning disrespect to being and or defamation to Plaintiff with no jus cause.

XLIII

That the Defendants set in motion a series of acts by others or knowingly Refusing to terminate a series of acts by other which they knew or reasonably should have known would cause others to inflict constitutional injury.

XLIV

That the Defendants set in motion acts and or performed the act of knowingly or should have known would cause or inflict constitutional injury and violate Plaintiff rights not only as a United States Citizen yet also as a human being.

XLV

That Defendants UNIVERSITY OF CHICAGO HOSPITAL SAFETY AND SECURITY OFFICER EARL EVANS (OFFICIAL AND INDIVISUAL CAPICITIES) MONICA HALLOM HOSPITAL EMPLOYEE (OFFICIAL AND INDIVISUAL CAPACITIES) JOHN DOE HOSPITAL EMPLOYEE 1 (OFFICIAL AND INDIVISUAL CAPACITIES) OFFICER JOHN DOE 1 (OFFICIAL AND INDIVISUAL CAPACITIES) OFFICER JOHN DOE 2 (OFFICIAL AND INDIVISUAL CAPACITIES) acted under the color of the state of Illinois.

XLVI

That the Defendants UNIVERSITY OF CHICAGO HOSPITAL SAFETY AND SECURITY OFFICER EARL EVANS (OFFICIAL AND INDIVISUAL CAPICITIES) MONICA HALLOM HOSPITAL EMPLOYEE (OFFICIAL AND INDIVISUAL CAPACITIES) JOHN DOE HOSPITAL EMPLOYEE 1 (OFFICIAL AND INDIVISUAL CAPACITIES) OFFICER JOHN DOE 1 (OFFICIAL AND INDIVISUAL CAPACITIES) OFFICER JOHN DOE 2 (OFFICIAL AND INDIVISUAL CAPACITIES) Deprived rights Under the color of the law.

XLVII

That the Defendants acted reckless, malice and unconstitutional training and or duty in an official position.

XLVIII

That the Defendants caused Defamation and hardship to Plaintiff.

XLIX

That not only did the Defendants perform unconstitutional actions but also caused unnecessary defamation and hardship to Plaintiff as a United States Citizen during Covid 19 pandemic.

L

That the Defendants were negligent by failure to use care as a reasonable prudent and careful person would use under similar circumstances including a broad range of acts or failures to act that result in Plaintiff hardship.

LI

That the Defendants UNIVERSITY OF CHICAGO HOSPITAL
UNIVERSITY OF CHICAGO HOSPITAL SAFETY AND SECURITY POLICE
DEPARTMENT ERIC HEATH ASSOCIATE VICE PRESIDENT
KYLE BOWMAN CHIEF OF POLICE created a policy or custom under which
unconstitutional practices occurred and allowed the continuance of such a policy or
custom.

WHEREFORE PREMISES CONSIDERED, Plaintiff, Zakkiyya Greene, and JANE DOE one-three Pray that this honorable court set a time and date to hear this matter with a Jury to determine a dollar amount that should be paid to the Plaintiff for Monetary, Compensatory and Punitive Damages.

Respectfully Submitted,

Zakkiyya Greene Pro Se Plaintiff
zakkiyyagreen@yahoo.com
312-451-2860